

1 CHARLES E. KELLY, ESQ.
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5 (702) 385-0777
6 Attorney for Defendant

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,) No: 2:10-cr-217-PMP-PAL
10)

11 Plaintiff,)

12 vs.)

STIPULATION TO AMEND
RELEASE CONDITIONS

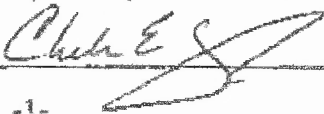
13)
14 NIKOLAI MLADENOV,)

15 Defendant.)


16 COMES NOW, Defendant Nikolai Mladenov, by and through his counsel, Charles E.
17 Kelly, and the United States, by and through Assistant United States Attorney, Eric Johnson, and
18 hereby request that this Court approve this Stipulation to Amend the Release Conditions.
19 Currently, the Defendant is under House Arrest with Electronic Monitoring. The Defendant has
20 entered into a Plea Agreement with the Government. The House Arrest and Electronic
21 Monitoring is no longer necessary in light of his entry of plea and further, the fact that he has
22 made each and every court appearance notwithstanding that he resides in Sunnydale, CA. Any
23 remaining conditions are to remain in effect.

24 WHEREFORE, Defendant Nikolai Mladenov and the United States request that this
25 Court remove the House Arrest and Electronic Monitoring restrictions to his terms of release.
26

27 Respectfully Submitted,
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6 
7 Eric Johnson
8 Assistant United States Attorney

9 "THE ABOVE-MENTIONED REQUEST TO
10 RELEASE THE DEFENDANT OF HOUSE ARREST
11 AND ELECTRONIC MONITORING IS HEREBY
12 GRANTED, ORDERED, AND ADJUDGED
13 DECREED. ALL REMAINING CONDITIONS
14 SHALL REMAIN IN EFFECT."

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16 PHILIP M. PRO
17 UNITED STATES DISTRICT JUDGE
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